SF2-014

December 2, 2005

Department of Energy
Bonneville Power Administration
P O Box 3621
Portland, Oregon 97208-3621

To Whom It May Concern:

Comments for the South Fork Flathead Watershed West Slope Cutthroat Trout Conservation Program that I commented on in the past apparently were not accepted or revued due to the dates of the scoping period. Therefore, I would like to resubmit my letter concerning this program under the December 12, 2005 comment period. My first letter is attached.

Sincerely,

Ronald N. Stuber, VMD

Rec'd
DEC 15 2005

June 3, 2003

BPA Communications Office
DM-7, P O Box 12999
Portland, OR 97212

RE: Westslope Cutthroat Trout Conversation Project in the South Fork Flathead Watershed

To Whom It May Concern:

In the early 1900's stocking non-native trout by the FWP wasn't a threat, then why is it now?

Almost 100 years of breeding, surviving, and enduring environmental changes, these fish have not migrated into the South Fork of the Flathead River according to FWP fish biologist. What makes this an immediate emergency or that this could even occur in the next 5, 10, or 30 years? The report makes it appear that only native westslope cutthroat trout provide good angling and that non-native trout don't provide this provision.

I feel the report is flawed and has very little scientific facts to support it's position.

I see several problems with this project.

1. When poisoning the fish in any given lake, there is a good possibility that not all fish will be killed, thus defeating the objective of establishing a pure species of westslope cutthroat in years to come.

2. When poisoning fish, 70% will die and go to the bottom of the lake and 30% will float and remain on the top according to the fish biologist. I would like to know how one establishes these facts and what scientific information was used to substantiate this. We were told these 30% "floaters" would be individually opened and their air bladder destroyed to allow them to sink! I don't know (nor do I think the FWP know) how many fish are in each individual lake. Let's assume there is 10,000 fish in a given lake, according to fish biologist, that would be 3,000 fish in that said lake would be individually opened by hand to accomplish the sinking of the dead fish. Does anyone have any idea how long that would manually take? I think the biologist need to get more facts and figures and scientific data before making conclusions.

3. Is the westslope cutthroat a hardier fish than the present non-native trout which has endured over the past 100 years? If so, what scientific data backs this? If not, then

what makes one think this pure species will survive the conditions (e.g. the harsh frozen waters from November to April) in these 6,000 to 10,000 alpine lakes?

4. Taking "motorized" equipment (planes, helicopters, motor boats, etc.) into the wilderness to accomplish this task, I am afraid will set a precedent for some future projects that the FWP or FS may want to do.

5. There are a lot of "unknowns" and undetermined facts with the killing and repopulating these fish. Assuming this were a successful project, it would take 10 to 25 years to develop a population of fish the size and numbers that currently are present to replace the present population.

6. One biologist told me that no non-native trout have gotten into the South Fork. Another biologist told me on another occasion that some have reached the South Fork. Which is it? If the second is true, than what prevents inbreeding and hybridized trout from occurring or continuing after pure westslope cutthroat have been introduced? Sounds like years down the road we'll have the same hybridized trout that you are trying to eliminate.

This idea of using brood stock of "genetically pure" westslope cutthroat to establish a genetically pure species, sounds a little bit like the Nazi Arien race of pure white arien Germans and extermination of Jews. Has any one heard of Darwin's "survival of the fittest"?

I was also told that one helicopter trip to one lake to drop the poison would cost $120,000 per trip. We talk about government spending, and I would think there is a better way to spend these several millions of dollars for such a project - but then the biologists and FWP wouldn't have jobs or be able to create jobs. These monies could be spent more wisely, less costly, and more efficiently to achieve the end results and still leave the present fish population in tact!

On page 5 of your Question 27, you mention restocking westslope cutthroat will have social benefits. What are these benefits? None are listed, and I can think of none!

My final comments on the project:

1. I am against killing off the non-threatening, non-injurious, and well established population of a hardy species of fish.

2. I think the millions of dollars spent on this project is a huge waste of funds that could be funneled to a more appropriate and worthy project.

3. I am concerned with setting a precedent for using motorized equipment in our wilderness which now prohibits non-motorized equipment, even chain saws.

4. I do not feel FWP has presented a good plan to exterminate these fish with sufficient documentation.

5. I further fail to see the scientific data to support their (FWP) findings and dubious future results.

Sincerely,

Ronald N. Stuber

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